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July 13, 2022

Hon. Edgardo Ramos  
United States District Judge  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007

U.S. v. Ahmed Mohammed El Gammal  
15. Cr. 588 (ER)

Dear Judge Ramos:

On Friday, July 8, the government submitted its response to Mr. El Gammal's petition pursuant to 28 U.S.C. § 2255. I am writing to respectfully request 90 days to prepare our response. The government has no objection to this request.

I make this request based on my current workload. In addition, as Mr. El Gammal has been working closely with counsel on this petition, this request accounts for the time needed to send drafts back and forth to California, where he is incarcerated, and to review them with my client in legal telephone calls.

90 days from July 8, 2022 would make our reply deadline October 6, 2022.

Thank you for your kind consideration of this request.

Respectfully submitted,



Sarah Kunstler  
Attorney for Ahmed Mohammed El Gammal